

Inspection Report Cover Sheet for RCRA Contractor Inspections in Iowa

TO BE COMPLETED BY THE ENSV ADMINISTRATIVE ASSISTANT. Please complete one cover sheet per original inspection report and affix this cover sheet to the top of the report.

1. Your name: Donna Arnold
2. Date document was submitted to the Records Center (MM/DD/YY):
7 / 29 / 09
- 3.a. Facility/Company or Site Name:
BES Industrial Services
- b. Facility address:
6738 6th St. SW, Cedar Rapids, IA 52404
- c. EPA ID number: IAD 074880444
4. Inspection Date(s): 6/16/09
5. Inspector's Name and Division/Branch:
Gary Witkowski EFCB/ENSV
6. Applicable Program (RCRA/Multimedia, etc.): _____
7. Number of pages in the inspection report: 40

NOTES TO RECORDS CENTER:

- Please scan and process this report in accordance with the "PROCEDURE FOR DIGITIZING AND COPYING INSPECTION REPORTS (7/6/07).
- Please file this report in **Doc Category: Enforcement**

493816



RCRA

A001

ENSV Inspection Transmittal Summary Report

Media:
RCRA CONTRACTO

Inspection Type:
CEI

Inspection Date:
06/16/2009

Preliminary SNC Findings:
No

Inspector:
RCRA CONTRACTOR BAH

Transmittal Date:

NOV / NOPV / NOPF:
Yes

Facility Name:
BES Industrial Services

Address:
6738 6TH ST SW
Cedar Rapids
IA
52404

ID Number:
IAD074880444

Activity Number: **MM Participating Programs:**

Federal Activity:
Drum Recycling

Federal Facility:
No

Potential EJ:
No

SBREFA Provided: Yes **Security Handout Provided:** Yes **MM Screening Completed:** Yes **EMS ISO 14001:** No **Compliance Officer:** Edwin Buckner

Selection Criteria 1:
Drum recycling

Selection Criteria 2:

ACS Code:

Inspection Findings:

Failure to label a used oil storage container with the words "used oil"

Comments:

Target Quality:

CESQG that has not been inspected before.

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

BES INDUSTRIAL SERVICES INC.

6738 6th Street SW.
Cedar Rapids, IA 52401
(319) 366-7266

EPA RCRA ID No. IAD074880444

ON

June 16, 2009

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Environmental Services Division

INTRODUCTION

At the request of the Environmental Services Division (ENSV) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on June 16, 2009, at the BES Industrial Services (BES) facility located in Cedar Rapids, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI, it was discovered that BES currently generates less than 100 kilograms (220 pounds) of hazardous waste per calendar month. At this generation rate, BES is currently operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste. BES is also operating as a generator of used oil. The CEI was conducted as a level B Multimedia Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

PARTICIPANTS

The following person participated in the CEI. A copy of the business card obtained from the facility representative during the CEI is included as Attachment 2.

Facility Representative, BES:

Name	Title	E-mail/fax	Phone
Todd Pender	Plant Manager	fax (319) 364-7610	(319) 366-7266

EPA Representative, Booz Allen Hamilton:

Name	Title	E-mail/fax	Phone
Clifford A. Nelles	Inspector	nelles_clifford@bah.com fax (816) 448-3850	(816) 448-3254

INSPECTION PROCEDURE

I arrived at BES at approximately 0755 hours to conduct the visual reconnaissance. The visual reconnaissance was conducted to identify and document potential areas of concern from the adjacent roadways. I identified no environmental issues or areas of concern during this preliminary examination.

At approximately 0800, I entered the main office at 6738 6th Street SW and identified myself to the receptionist. I explained the purpose of the CEI to her and she contacted Mr. Todd Pender. Mr. Pender was enroute to the facility and arrived in approximately 10 minutes. I introduced myself to Mr. Pender and explained the purpose of the CEI to him. I then proceeded to conduct an entry briefing with Mr. Pender in his office.

During the entry briefing, I presented Mr. Pender with my EPA credential letter and business card; and a letter and business card from the EPA Task Order Contracting Officer Representative (TOCOR), Mr. Gary Witkovski.

I presented Mr. Pender with a copy of RCRA §3007(a) (stipulating hazardous waste inspection authority) and a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). These documents were read by Mr. Pender prior to proceeding with the CEI. I also explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Pender. I also stated that, at the conclusion of the CEI, he would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.

The CEI consisted of a discussion of facility operations, waste generation and waste management practices, review of pertinent records, visual inspection, and an exit briefing. Mr. Pender acted as the official facility representative during the CEI and accompanied me during the visual inspection.

I completed the CEI and summarized my findings and recommendations on June 16, 2009, with Mr. Pender. Based upon the initial observations, **I issued a Notice of Preliminary Findings (NOPF) to BES at the conclusion of the CEI.**

During the exit briefing, Mr. Pender acknowledged receipt of the following by his signature: a Confidentiality Notice (Attachment 3), which he read and signed indicating no confidential business information had been provided during the CEI, and the NOPF (Attachment 4). Nine (9) photographs were taken during the CEI, and are included in Attachment 5.

FINDINGS AND OBSERVATIONS

Facility Operations

According to Mr. Pender, BES is a plastics recycler. BES receives pieces and empty containers made of plastic, shreds them, and then sells the shredded plastic to wholesalers. Mr. Pender stated that BES only receives and shreds RCRA-empty plastic containers. BES's primary North American Industrial Classification System (NAICS) code is 423930 (Recyclable Merchant Material Wholesalers).

BES has been in operation at its current location since 1994. The facility consists of a rectangular-shaped building of approximately 10,000 square feet. BES currently employs four full-time personnel, who work one shift (0900-1700), Monday through Friday.

Mr. Pender stated that Mr. Glen Stouwie is the owner of BES. Three other businesses are located in the building (Specialized Products Pro Design and Fabrication, CRST Flatbed, and Landstar Ranger). Mr. Stouwie is the president, vice-president, or owner of these three businesses as well. However, BES operates independently from the other businesses in the building.

Facility Status

The RCRA Handler Information Report (Attachment 6) indicates that BES is registered with EPA under EPA ID IAD074880444, however no regulated activity is listed. While performing a pre-inspection file review at EPA, I noted that EPA ID IAD074880444 was previously registered to a business named Product Design and Fabrication. Its location was the same as the current BES address. According to the EPA file information, a CEI was conducted at Product Design and Fabrication in 1992 with several violations noted. The EPA returned in 1993 to conduct another CEI, and noted that the facility was closed and in receivership in bankruptcy court. According to Mr. Pender, BES began operations at this location in 1994 and is unrelated to the previous facility.

Through a review of current operations, interviews, and waste disposal records, I determined that BES is currently generating approximately less than one pound of hazardous waste per month (approximately four spent, hazardous waste fluorescent lamps per year). As such, BES is currently operating as a CESQG of hazardous waste (D009 characteristic hazardous waste).

Following the CEI, I amended the RCRA Handler Information Report to reflect BES's current operation. I amended the NAICS, added the contact information, current owner, and owner type. I also added CESQG as the type of regulated activity, and added the characteristic hazardous waste code D009 to the list of hazardous wastes generated.

Facility Waste Streams

Following is a Waste Stream and Waste Handling Table for BES. The table describes the major waste streams generated on-site, waste management practices, and off-site treatment, storage, and disposal. A description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 7).

**Waste Stream and Waste Handling Table
BES INDUSTRIAL SERVICES– Cedar Rapids, IA**

Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
1) Spent Fluorescent Lamps	Generated from maintenance replacing spent lamps	Hazardous based on product knowledge (D009)	Approximately four spent lamps per year	Facility disposes of in general trash	Picked up by A1 Disposal for disposal in landfill (Linn County Solid Waste Agency Landfill)
2) General Trash	Generated from offices	The facility considers this waste to be nonhazardous based on product knowledge	Unknown	Various containers throughout the facility	Picked up weekly by A1 Disposal for disposal in landfill (Linn County Solid Waste Agency Landfill)
3) Used Oil	Maintenance of fork trucks	The facility considers this waste to be used oil, per 40 CFR 279	Approximately five gallons per year	Stored in five-gallon used oil storage container	Shipped offsite by Altorfer Lift Truck until 2008. No offsite disposition of used oil generated since 2008.
4) Used Oil Filters	Maintenance of fork trucks	The facility considers this waste to be used oil, per 40 CFR 279	Approximately two filters per year	Stored in five-gallon used oil storage container	Shipped offsite by Altorfer Lift Truck until 2008. No offsite disposition of used oil filters generated since 2008.

Visual Inspection

The manufacturing processes and facility maintenance activities generate the solid wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation, accumulation, and storage areas associated with these wastes were visually inspected.

During the visual inspection, I observed a pallet of five-gallon plastic containers (Attachment 5, Photo 1). Mr. Pender explained that these containers are factory seconds (products that have imperfections and are not considered sellable). I also observed a one-cubic yard container of factory seconds of plastic plumbing fixtures and a plastic spool (Attachment 5, Photo 2). Mr. Pender explained that the containers, fixtures, and the spool will be shredded and deposited into a one-cubic yard container (Attachment 5, Photos 3 and 4). BES considers the shredded plastic to be a product, and sells the shredded plastic to wholesale facilities.

I also observed a one-cubic yard container of shredded plastic from the shredding of empty 55-gallon plastic containers (Attachment 5, Photo 5). I asked Mr. Pender if the 55-gallon containers are washed and empty when received at BES. He stated that these 55-gallon containers were received from General Mills, and that they were triple washed at General Mills prior to shipment to BES. He stated that all containers are RCRA empty when received at BES. I asked Mr. Pender what the procedure is if a container that is not RCRA empty is received. He stated that if a container is not RCRA empty, the generator would be contacted to determine what the container formerly held. If it is determined that any container residue is a nonhazardous waste, the contents would be drained into the sanitary sewer prior to container shredding. However, according to Mr. Pender, BES has not received any containers that were not RCRA empty.

I observed a five-gallon used oil storage container in the North part of the facility (Attachment 5, Photo 6). The used oil storage container is compatible with the waste, open, and contains approximately four gallons of used oil and two used oil filters. However, the used oil storage container is not labeled. I explained to Mr. Pender that used oil storage containers must be labeled with the words "used oil."

NOPF#1 – Failure to label a used oil storage container with the words "used oil" [40 CFR §279.22(c)(1)].

During the CEI, BES employees addressed item No. 1 by labeling the used oil storage container with the words "used motor oil." Employees also removed the two used oil filters from the used oil storage container, and placed them into a second, five-gallon used oil storage container. The second used oil storage container is structurally sound and labeled with the words "used motor oil." I photographed the newly-labeled used oil storage containers (Attachment 5, Photos 7-9).

I asked Mr. Pender how the used oil is generated. He stated that the used oil and used oil filters are generated from routine servicing of BES's two fork trucks. Mr. Pender stated that he thought Altorfer Lift Truck had performed routine fork truck maintenance at BES (including waste disposal) in the past. However, BES has performed fork truck maintenance since 2008. Mr. Pender stated that fork truck oil and oil filters are changed approximately once per year.

At the time of the CEI, BES has not determined where the used oil and used oil filters will be shipped for disposal.

I did not observe any spent fluorescent lamps in storage during the CEI. I asked Mr. Pender how BES disposes of its spent lamps. He stated that the spent lamps are determined to be hazardous (D009), and that spent lamps are disposed in the general trash. He also stated that BES replaces approximately four lamps per year. As a CESQG, BES has made a hazardous waste determination on spent fluorescent lamps and disposes of spent fluorescent lamps in a state-permitted facility (Linn County Solid Waste Agency Landfill). Therefore, I noted no RCRA concerns with the disposal of spent fluorescent lamps in the general trash.

Records

As a CESQG, BES is not subject to the RCRA recordkeeping requirements. I asked Mr. Pender if BES maintained any waste disposal records (e.g., manifests, invoices, or bills of lading) or other RCRA-related records (e.g., waste determination records, training). He stated that BES does not have any of these records. As such, I did not conduct a records review during the CEI.

It appears that BES is in compliance with all remaining CESQG requirements (see Attachment 7).

At the conclusion of the CEI, I conducted an exit interview with Mr. Pender. I discussed the preliminary findings noted during the visual inspection, and the regulations pertaining to each situation. Additionally, I provided Mr. Pender with copies of the following materials:

- EPA *Notification of Regulation Waste Activity* booklet
- EPA *Publications for Small Business*
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*
- EPA *Managing your Hazardous Waste, a Guide for Small Business*
- EPA *Managing Used Oil, Advice for Small Business* handout
- EPA Environmental Fact Sheet: *Properly Managing Used Oil Filters*
- Iowa Department of Natural Resources Used Oil Transporters and Processors Directory
- EPA Supplemental Information for Small Businesses Subject to a U.S. EPA Enforcement Action handout
- EPA Innovative Solutions to your Environmental Challenges pamphlet
- EPA Office of Enforcement and Compliance Assurance Information Sheet & US EPA Small Business Resources handout
- EPA National Compliance Assistance Clearinghouse pamphlet
- Compliance Assistance Centers Handout
- Iowa Business Assistance pamphlet
- Iowa Waste Reduction Center pamphlet

- Iowa Department of Natural Resources Pollution Prevention Services pamphlet

During the CEI, I asked Mr. Pender for a copy of a facility map. He could not locate a map during the CEI, but stated that he would send one after the CEI. On June 22, 2009, Mr. Witkovski called to inform me that he had received the copy of the facility map. Mr. Witkovski forwarded me the map copy, which is included in Attachment 8 of this report.

SUMMARY

During the BES CEI, I discovered through interviews and visual inspection that BES is currently generating less than one pound of hazardous waste per calendar month. As such, BES is currently operating as a CESQG of hazardous waste (D009 characteristic hazardous waste). **I issued an NOPF to BES at the conclusion of the CEI.** Before exiting the facility, I referred to the EPA Task Order Contract Officer Representative's contact information letter, which was presented to Mr. Pender during the entry briefing. I encouraged Mr. Pender to provide EPA with written planned and/or completed actions as corrective measures to the NOPF.

Clifford A. Nelles
Clifford A. Nelles

Date: 07/21/2009

ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copy of Facility Representative's Business Card (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Notice of Preliminary Findings (NOPF) (1 page)
- 5: Photographic Documentation (6 pages)
- 6: Copy of EPA RCRA Handler Information Report (1 page)
- 7: CEI Worksheets and Checklists (10 pages)
- 8: Copy of Facility Map (1 page)

Attachment 1

Region 7 Multimedia Screening Checklist

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: BES INDUSTRIAL SERVICES Inspector CLIFFORD ALAN NELLES
Facility Ownership: GLEN STOUWIE Primary Media: RCRA
Street: 6739 6th STREET SW Inspector Phone Ext.: 816-448-3254
City: CEDAR RAPIDS State: IA Zip: 52401 Date: 06/16/2009
Phone: 319-366-7266 Facility Contact: TODD PEPPER SIC/NAICS Code 423930
Number of Employees: 4 Work Hours/Shifts 0900-1700 M-F Facility Subject to OSHA regulations Yes ☒ No ☐

Main facility activity, major process chemical(s) & description: PLASTIC RECYCLER

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ ,
water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,
non-halogenated-based ☐) , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other _____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ **Forward to EJ**

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☒ **Forward to EPCRA**
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ **Forward to EPCRA**
3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**
a. Stored ≥ 500 lbs of ammonia ☐ , ≥ 100 lbs of chlorine ☐ , or $\geq 10,000$ lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐
b. Stored $\geq 10,000$ lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
c. Used $\geq 10,000$ lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
d. Generated \geq one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ **Forward to TSCA and ask** Has facility tested oil filled equipment to determine PCB content? No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
If yes, are all wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ **Forward to CWA**
If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ **Forward to CWA**
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____
(Get Photo) **Forward to CWA**
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) **FWD to Wetlands**

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ **Forward to UIC**
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ **Forward to PWS**
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ **Forward to CAA**
Source _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ **Forward to CAA Describe:** _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ **Forward to CFC**
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: _____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ **Forward to EPCRA/RMP**
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ **Forward to CFC**

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☒ (stop) Yes ☐
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ **Forward to RCRA**
2. Is hazardous waste treated ☐ , stored >90-days ☐ , burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ **Forward to RCRA**
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐

Material Claimed To Be Non-Hazardous

How does the facility know these wastes are non-hazardous?

_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ;	None available <input type="checkbox"/> Forward to RCRA
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ;	None available <input type="checkbox"/> Forward to RCRA
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ;	None available <input type="checkbox"/> Forward to RCRA
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ;	None available <input type="checkbox"/> Forward to RCRA
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ;	None available <input type="checkbox"/> Forward to RCRA

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ **Forward to RCRA**
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ **Forward to RCRA**
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ **Forward to RCRA & EPCRA** Describe: _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ **Forward to UST**
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ **Forward to UST**

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ **Forward to SPCC**
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ **Forward to SPCC**
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) **Forward to SPCC**

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☒ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

*** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS**

Attachment 2

Copy of Facility Representative Business Card



BES
Industrial Services, Inc.

TODD PENDER

Phone: (319) 366-7266
Cell: (319) 389-6072
FAX: (319) 364-7610

P.O. Box 1181
Cedar Rapids, IA 52406-1181

Attachment 3

Copy of the EPA Confidentiality Notice

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>BES INDUSTRIAL SERVICES</i>	
Facility Address <i>6738 6th STREET SW CEDAR RAPIDS, IOWA 52404</i>	
Inspector (print) <i>CLIFFORD ALAN NELLES</i>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101 <i>CAN</i>	Date <i>06/16/2009</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Todd Pender</i>	Signature/Date <i>Todd Pender</i> <i>6-16-09</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

Attachment 4

Copy of Notice of Preliminary Findings

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: BES INDUSTRIAL SERVICES INC.
ADDRESS: 6738 6th STREET SW
CEDAR RAPIDS IOWA 52404
EPA ID NUMBER: ~~NOA~~ IAD074880444 DATE: 06/16/2009
CAN

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

- STORAGE
^
1. FAILURE TO LABEL A CONTAINER OF USED OIL AS "USED OIL"
279.22 (C)(1) 40 CFR 279.22 (C)(1)
 2. _____
 3. _____
 4. _____
 5. _____
 6. _____
 7. _____

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Todd Pender TITLE: _____

SIGNATURE: Todd Pender

This document was prepared by CLIFFORD ALAN NELLES

Attachment 5

Photographic Documentation

PHOTO LOG

Facility Name / City: BES INDUSTRIAL SERVICES INC.
6738 6th STREET SW
CEDAR RAPIDS, IA 52401

Facility ID #: IAD074880444

Date: June 16, 2009

Photographer: Clifford A. Nelles

Type of Camera: Sony Digital Still Camera, DCS-P72, Serial #1398911

Digital Recording Media: Memory Stick

All digital photos were copied by: Sona Holder on 2009.

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by Sona Holder. No changes were made in the original image files prior to print and storage on the CD-R.

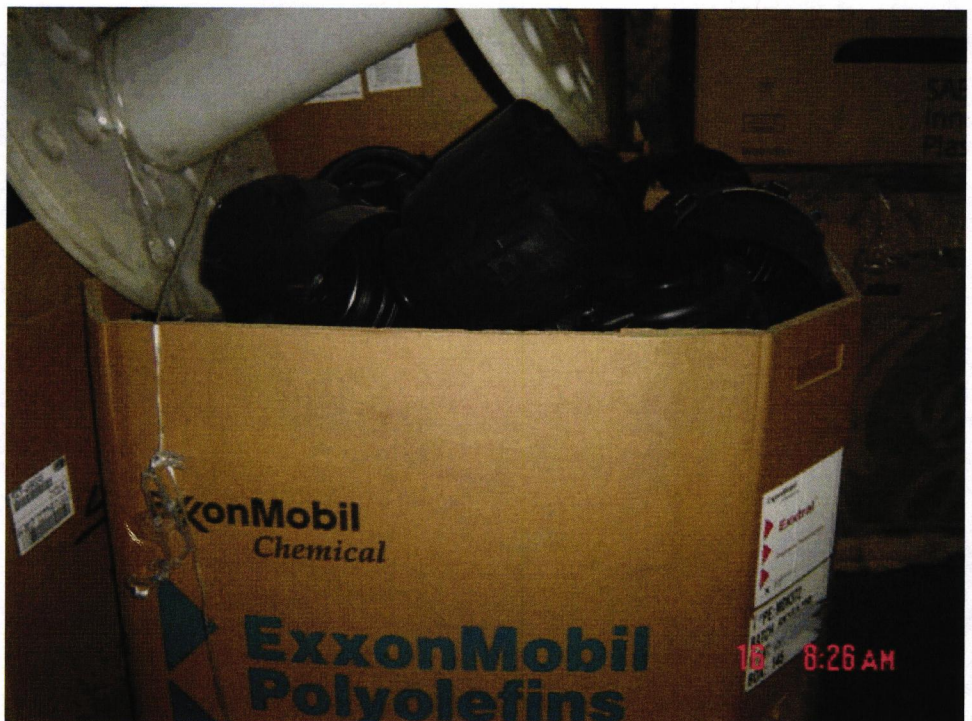
Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Clifford Nelles	06/16/09	0826	003	Empty, five-gallon plastic containers (Factory Seconds) that are shredded for recycling
2	Clifford Nelles	06/16/09	0826	004	Factory seconds of plastic plumbing fixtures and plastic spool that are shredded for recycling
3	Clifford Nelles	06/16/09	0824	001	One-cubic yard container of recycled shredded plastic containers and plumbing fixtures; container is approximately ½ full. Shredded plastic is sold as a product to wholesalers.
4	Clifford Nelles	06/16/09	0824	002	View inside of the container shown in Photo # 3
5	Clifford Nelles	06/16/09	0827	005	One-cubic yard container of shredded, empty, plastic 55-gallon containers. Container is full. Shredded plastic is sold as a product to wholesalers.
6	Clifford Nelles	06/16/09	0853	006	Five-gallon used oil storage container (blue). Container is open, compatible with the waste, and holds approximately four gallons of used oil and two used oil filters. The used oil storage container is not labeled with the words used oil.
7	Clifford Nelles	06/16/09	0910	007	Used oil storage container shown in Photo # 6 after employees labeled the container. The used oil filters have been removed, and container is labeled "Used Motor Oil."
8	Clifford Nelles	06/16/09	0910	008	Used oil storage container holding two used oil filters (the two used oil filters shown in Photo #6). The used oil storage container is open, compatible with the waste, is labeled "Used Motor Oil."
9	Clifford Nelles	06/16/09	0910	009	View inside of the used oil filter storage container shown in Photo # 8.

BES Industrial Services Inc.
Cedar Rapids, Iowa

Photo Number: 1
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0826
Description: Empty, five-gallon
(Factory Seconds)
plastic containers that
are shredded for
recycling.



Photo Number: 2
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0826
Description: Factory seconds of
plastic plumbing
fixtures and plastic
spool that are shredded
for recycling.



BES Industrial Services Inc.
Cedar Rapids, Iowa

Photo Number: 3
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0824
Description: One-cubic yard container of recycled shredded plastic containers and plumbing fixtures; container is approximately ½ full. Shredded plastic is sold as a product to wholesalers.



Photo Number: 4
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0824
Description: View inside of the container shown in Photo # 3.



BES Industrial Services Inc.
Cedar Rapids, Iowa

Photo Number: 5
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0827
Description: One-cubic yard container of shredded, empty, plastic 55-gallon containers. Container is full. Shredded plastic is sold as a product to wholesalers.



Photo Number: 6
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0853
Description: Five-gallon used oil storage container (blue). Container is open, compatible with the waste, and holds approximately four gallons of used oil and two used oil filters. The used oil storage container is not labeled with the words used oil.



Photo Number: 7
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0910
Description: Used oil storage container shown in Photo # 6 after employees labeled the container. The used oil filters have been removed, and container is labeled "Used Motor Oil".

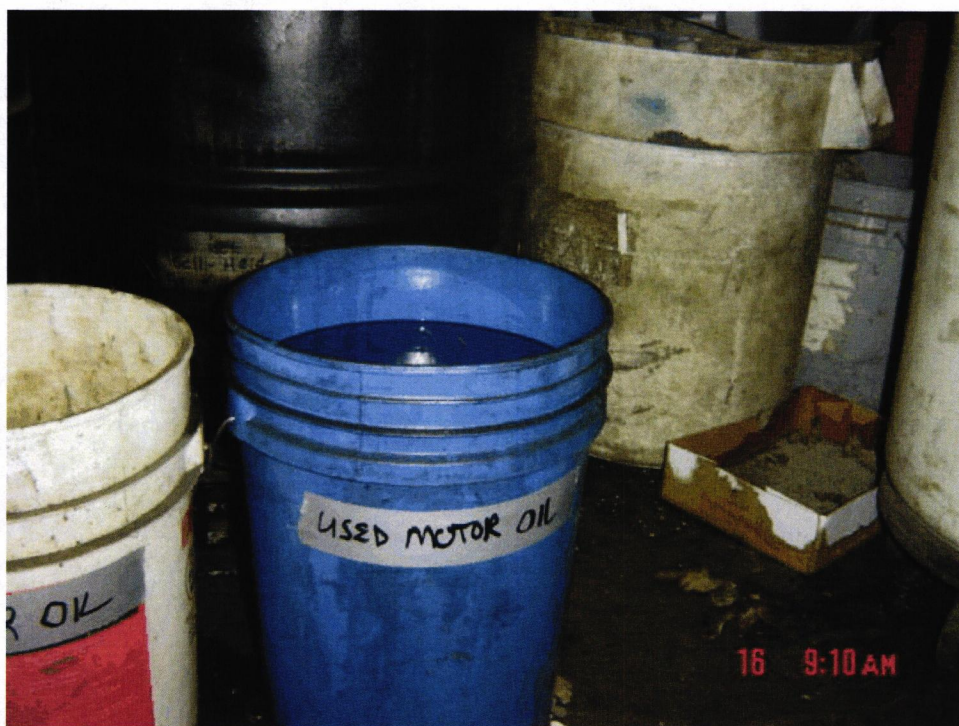


Photo Number: 8
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0910
Description: Used oil storage container holding two used oil filters (the two used oil filters shown in Photo # 6). The used oil storage container is open, compatible with the waste, is labeled "Used Motor Oil."



BES Industrial Services Inc.
Cedar Rapids, Iowa

Photo Number: 9
Photographer: Clifford Nelles
Direction: N/A
Date: 06/16/09
Time: 0910
Description: View inside of the used
oil storage container
shown in Photo # 8.



END OF PHOTOGRAPHIC DOCUMENTATION

Attachment 5 Page 6 of 6

Attachment 6

Copy of EPA RCRIS Handler Information Report

HANDLER INFORMATION REPORT

January 7, 2009

Procedures for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/RESP.

EPA RCRA ID Number: IAD074880444

Name of Company/Site: BES INDUSTRIAL SERVICES INC
Location of Site: 6738 6TH ST SW
CEDAR RAPIDS, IA 52401
LINN County

Land Type: Private
423930

NAICS: ~~42193~~ - Recyclable Material Wholesalers
CAN

Mailing Address: PO BOX 1181
CEDAR RAPIDS, IA 52406

Site Contact: TODD PENDER
Address: Same as Mailing Address
(319) 366-7266

Current Owner of Site: GLEN STOUWIE
Address: SAME

Owner Type: PRIVATE

Current Operator of Site: ~~GLEN STOUWIE~~ BES INDUSTRIAL SERVICES
Address: SAME

Operator Type: PRIVATE

TYPE(S) OF REGULATED ACTIVITY: ~~None~~
CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR

Hazardous Wastes Handled: D009

I 12/07/94 N N 05/12/88 2

Certified by State/EPA on 12/07/94 by

Attachment 6 Page 1 of 1Date of Site Visit: 06/16/2009Name of Inspector (Please print): CLIFFORD ALAN NELLES(Check one): ☐ EPA R7 ENSV ☒ EPA R7 Contractor ☐ NOWCC/SEE InvestigatorSignature of Inspector: Clifford A. Nelles

Attachment 7

CEI Worksheets and Checklists

Appendix 1-3

Facility: BES INDUSTRIAL Date: 06/16/09 Arrival time: 0800

DRIVE-BY

1. Drive-by conducted from public right-of-way?

☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):

SEE SITE PLAN

3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No

- | | | | |
|--------------------|--------------------|------------------------|-----------------------|
| - Containers | - Tanks | - Processing Equipment | - Loading Areas |
| - Unloading Areas | - Security Devices | - Open Drums | - Stressed Vegetation |
| - Unusual Staining | - Unusual Odors | - Obvious Discharges | - Improper Disposal |
| - Safety Concerns | - Other Concerns | | |

Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): TODD PENDER Title: PLANT MANAGER

_____ Title: _____

_____ Title: _____

3. Does representative have intimate knowledge of all waste management practices? ☐ Yes ☒ No

How long in position? 12 years

4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained the purpose, scope, and order of the inspection
- ☒ Completed Multimedia screening checklist
- ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒ Provided SBRFA
- ☐ Obtained GPS reading
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☐ By facility representative or Other (name): _____

☐ No - Access denied. Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access:

Appendix 1-5

FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: 1994 Number of employees: 4
 Number of shifts/hour worked: 9-5 Number of days worked per week: M-F
 Size (sq. ft., how divided): 7,500

Property owner and facility operator the same? ^{CAN}
~~Yes~~ ☒ No

GLEN STOUWIE

2. Major products or services provided: PLASTICS RECYCLER

3. Major raw materials used: EMPTY PLASTIC CONTAINERS AND PARTS

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process

Waste Stream(s)

SEE WASTE STREAM TABLE

5. Complete a Generator Waste Stream Worksheet and /or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

CHANGED NAICS, SITE CONTACT, OWNER, OWNER TYPE, OPERATOR, OPERATOR TYPE, REGULATED ACTIVITY, ADDED P009 WASTE CODE

7. **GENERATOR STATUS:** (based on records review)

- ☐ Non-generator
☒ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)
☐ SQG (100-1000kg/mo and accumulate <6000kg)
☐ LQG (>1000kg/mo)

Is facility's status solidly within above category?
(If not carefully verify status and document) ☒ Yes ☐ No

8. **TSD STATUS:**

☐ Treatment ☐ Storage ☐ Disposal

Note: Types of units, number of units, capacities, processes, etc:

CAN

9. Resolved questions from Pre-Inspection Worksheet? ☐ Yes ☐ No ☒ No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet? ☐ Yes ☐ No ☒ No Questions

11. Requested site map or diagram to identify all observations? ☒ Yes ☐ None Available

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: SPENT FLUORESCENT LAMPS

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D009

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: _____

GENERATING PROCESS: REPLACING SPENT LAMPS

GENERATION RATE: 4-5 PER YEAR

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

DISPOSED OF IN GENERAL REFUSE

OFF-SITE MANAGEMENT/DISPOSITION: PICKED UP BY AI DISPOSAL FOR DISPOSAL IN LANDFILL

2. WASTE STREAM: GENERAL TRASH

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NONE

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: _____

GENERATING PROCESS: OFFICES

GENERATION RATE: UNKNOWN

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

VARIOUS CONTAINERS THROUGHOUT FACILITY

OFF-SITE MANAGEMENT/DISPOSITION: PICKED UP BY AI DISPOSAL FOR DISPOSAL IN LANDFILL ON A WEEKLY BASIS

3. WASTE STREAM: USED OIL

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NONE

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: _____

GENERATING PROCESS: MAINTENANCE OF FORK TRUCKS

GENERATION RATE: ~ 5 GALLONS PER YEAR

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

STORED IN 5 GALLON CONTAINER

OFF-SITE MANAGEMENT/DISPOSITION: ALTORFER FORK LIFT MAINTAINED UNTIL 2008, BES HAS NOT DISPOSED OF USED OIL FROM FORK TRUCK MAINTENANCE AT THE END OF 2008

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

4 ^{can}
1. WASTE STREAM: USED OIL FILTERS

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: NONE

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: _____

GENERATING PROCESS: CHANGING FILTERS ON 2 FORK TRUCKS

GENERATION RATE: ~2 PER YEAR

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☒ Visually inspected

STORED in 5 GALLON CONTAINER

OFF-SITE MANAGEMENT/DISPOSITION: HAVE NOT DISPOSED OF FILTERS ON MAINTENANCE PERFORMED in 2008

2. WASTE STREAM: _____

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: _____

3. WASTE STREAM: _____

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: _____

Appendix 1-6GENERATOR WASTE STREAM WORKSHEET

1. **WASTE STREAM:** _____

FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: _____

2. **WASTE STREAM:** _____

FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: _____

3. **WASTE STREAM:** _____

FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: _____

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: TODD PENDER'S OFFICE
2. Person responsible for waste analysis/waste determination: TODD PENDER

#	✓/✗	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	NA CAN	Determines waste does <u>not</u> meet applicable treatment standards (ATS)-268.7(a)(2)	
a.	N/A	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.	N/A	SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.	N/A	Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.	N/A	Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.	N/A	Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.	N/A	Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.	N/A	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.	N/A	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.	N/A	Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.	N/A	Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.	N/A	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.	N/A	Additional special rules regarding waste that exhibits a characteristic-268.9	

D. PERSONNEL TRAINING

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.		Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	C.A.V.
2.		Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.		Employees are trained annually (LQG only)→265.16(c)	
4.		Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.		Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.		Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.		Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.		Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.		Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	
10.		All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

√ - in compliance x - not in compliance N/A - not applicable * - please note applicable permit requirements

11. Notes/Observations: _____

Tank #2 – Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: _____

Area noted on map or diagram: ☐ YES ☐ NO

Tank #3 – Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: _____

Area noted on map or diagram: ☐ YES ☐ NO

Tank #4 – Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: _____

Area noted on map or diagram: ☐ YES ☐ NO

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
 - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
 - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.
- ☒ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
- ☒ Summarized findings and observations for the facility representatives
- NOPE*
NOV
CAN issued? ☒ Yes ☐ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations
- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☐ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations? ☐ Yes ☒ No

5. Facility has its own environmental staff? ☐ Yes ☒ No

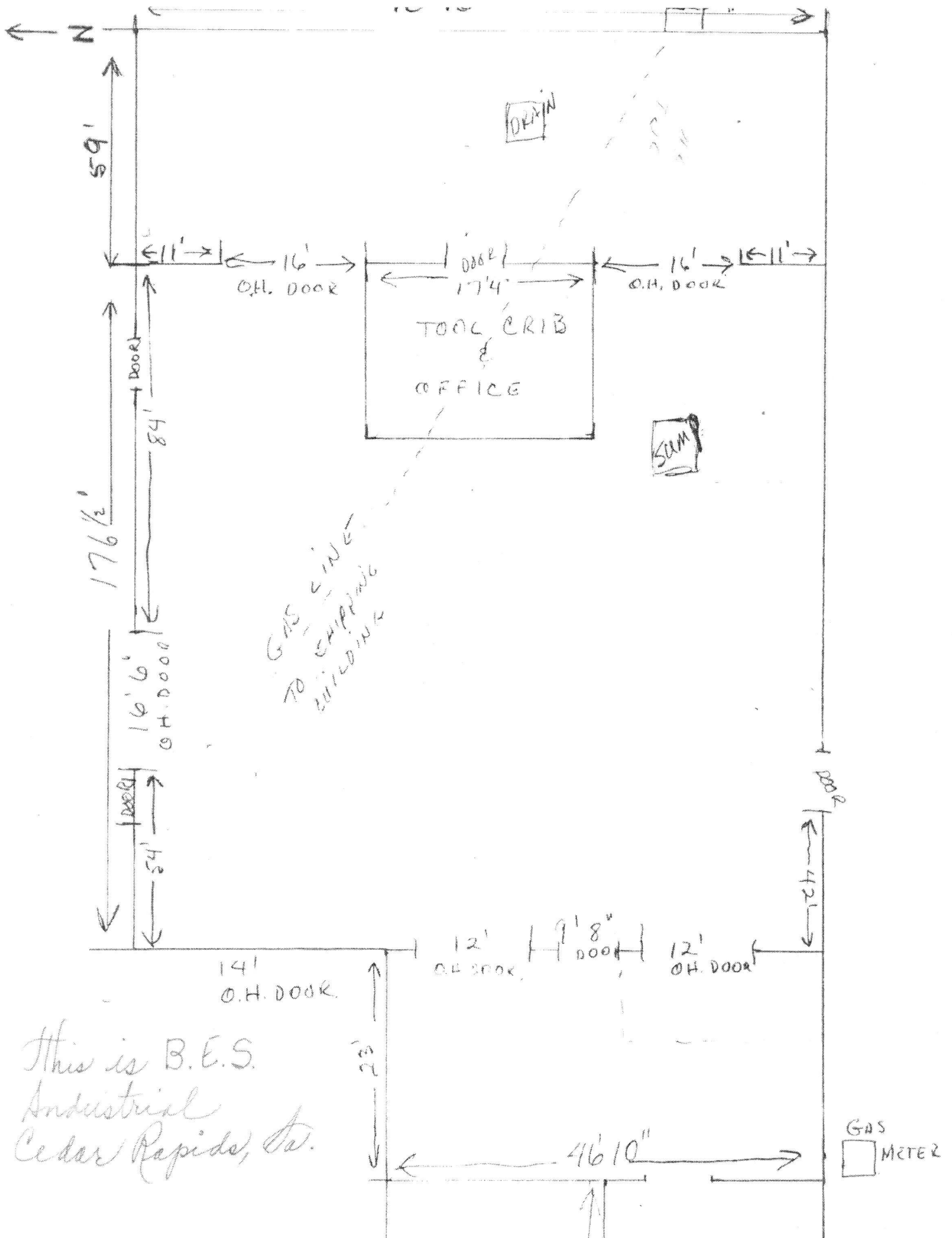
6. Facility has copy of applicable regulations? ☐ Yes ☒ No

7. Attitude and demeanor of facility representative(s); ☒ OK ☐ Not OK

8. Notes/Observations:

Attachment 8

Copy of Facility Map



This is B.E.S.
Industrial
Cedar Rapids, Ia.

DOCUMENT CONTROL CHECK SHEET

Air	RCRA	Water	Other
	X		

Facility/Site Name and Location: BES Industrial Services, Inc.

6738 6th Street SW, Cedar Rapids

IA	KS	MO	NE
X			

Yes No NA

Other Documents (list below) (X) () ()

RCRA Inspection Photos - Archival Copy 1 ^{Disc} ₅₀₀ Pages

 Pages

C Pages

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Clifford A. Kelle
Activity Leader's Signature

07/21/2009
Date Signed

①

BES Industrial Services 6/6/09

423930 - NAICS

7:55 - 8:00

Tammy

Todd PENDER

Triple rinsed food grade

5 gal buckets 55 gal barrels

All disposed general trash

altofer charges out in fork trucks

General mills

contact generator paid out,

4015 a year - VW

²
150
50
7500